

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

OLIVIER MARTINEZ and SHEEBA, INC.,

Plaintiffs,

- against -

VAKKO HOLDING A.S., VAKKO TEKSTIL  
VE HAZIR GIYIM SANAYI ISLETMELERI A.S.,  
CEM HAKKO, STARWORKS, LLC, TURK  
HAVA YOLLARI A.O., TURKISH AIRLINES,  
INC. and JOHN DOES, 1-10,

Defendants.

07 CV 3413 (LAP)

(Oral Argument Requested)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Lara E. Romansic, Esq., sworn to on September 26, 2007 (and the exhibits annexed thereto), and all prior pleadings and proceedings herein, defendant Starworks, LLC, ("Starworks"), by its counsel, Steptoe & Johnson LLP, will move this Court before the Honorable Loretta A. Preska, at the United States Courthouse, 500 Pearl Street, New York, New York on October 18, 2007 at 9:00 a.m., or as soon thereafter as counsel may be heard, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint of plaintiffs Olivier Martinez ("Martinez") and Sheeba, Inc. ("Sheeba"), together with such other and further relief as this Court deems just and proper.

Dated: New York, New York  
September 26, 2007

STEPTOE & JOHNSON LLP

By: /s/ Evan T. Barr  
Evan T. Barr (EB-1438)  
Lara E. Romansic (LR-9236)  
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*Attorneys for Defendant  
Starworks, LLC*